

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PLAINTIFF, *Leonard K. Baylis*)
v. V) CIVIL ACTION NO. 06-11-SLR
DEFENDANT, *Stan Taylor et al*)

1/17/2006

MOTION FOR APPOINTMENT OF COUNSEL

COMES NOW, THE Plaintiff, *Leonard Baylis*, Pro-Se and moves this Honorable Court for Appointment of Counsel, to represent Plaintiff.

DA
BD scanned

In support of this Motion Plaintiff states that the following is true and correct, to the best of his knowledge and belief:

1. Plaintiff is incarcerated.
2. Plaintiff is unskilled in the law.
3. The administration at the Delaware Correctional Center where the Plaintiff is held limits the days and times that Plaintiff is allowed access to the law library.
4. Knowing that there will be testimony from witnesses, and expert testimony, which will put the Pro-Se Litigant at a considerable disadvantage.
5. Appointment of Counsel would serve "the best interests of justice" in this case.
6. Please see Attached

WHEREFORE, Plaintiff prays this Honorable Court appoint counsel to represent the Plaintiff.

DATE: 11 January 06

Leonard K. Baylis

Delaware Correctional Center
Smyrna, DE 19977

Re: 06-11-SLR

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For these additional reasons, I leasured
Baylor, Respectfully Request Appointment of
Counsel:

Because of my mental health problems I have
trouble expressing what I believe needs to be
expressed. I get frustrated and mixed up.
I forget important issues because of
distractions and emotions. Sometimes I lose
my temper, my hands and arms swing out
of control and I defeat myself.

An Attorney is needed to gain access to
witnesses and Correctional Medical Systems
(C.M.S.) Records that show actual treatment
Accomplished vs. what is inflated, changed
or covered up in this case; that shows
C.M.S. and The Department of Corrections
in a favorable light, regardless of reality;

To properly apply this case in the light
of present medical and mental health
MANDATES as established in Tilley vs.
Owens, 719 F.Supp 1256 (upheld, 3rd Circuit;
907 F.2d 418)

An Attorney is needed to make provisions for an unbiased, independent examination to be accomplished outside the auspices of Corrections Medical Systems and the Dept. of Corrections — This done on an emergency basis, with Release of medical, medication and housing as recommended. Mervin has a rare combination of disorders — outside the posited "Abilities" of Corrections Medical Systems and the Department of Corrections — and must be treated synergistically. Failing this, Mervin's condition can only be compounded, and punished further than is humanly

Re: 06-11-SLR

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An Attorney is needed to MAKE
provisions for an unbiased, independent
examination, to be accomplished outside
the Auspices of Correctional Medical
Systems and the Department of Corrections.
This done on an emergency basis, with
relevant treatment, medication, and housing
as recommended. Movant has a rare
combination of disorders — outside the
present "abilities" of Correctional Medical
Systems and the Department of Corrections —
and must be treated synergistically. Failing
this, Movant's conditions can only be
compounded, and punishment carried
further than is humane.

Respectfully Submitted, 11 Jan 06

Leonard Baylis

LEONARD BAYLIS

IM Received Baffis
SBI# 100231 UNIT ✓
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Clerk of the Court
U.S. District Court, District of Delaware
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Wilmington, Delaware
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